

November 30, 2005

To: Office of the Attorney General, Attn: Craig Maravich, Esq.

From: Robert Richmond, Plaintiff

Re. Civil Action No. 99-192 Frie

Telephone Status Conference, dated, November 30, 2005

Before Hon. Judge, Sean J. McLaughlin

Dear Mr. Maravich,

I am contacting you as directed by Judge McLaughlin in regards to establishing a monetary amount of demand in regards to settlement of the above captioned case.

During our telephone conversation today the Judge stated on record that I should contact you via correspondence, make a demand (monetary) and that you would contact the necessary officials and then make a counter-offer in an effort to resolve the case.

Furthermore, Judge McLaughlin stated that a trial, which is expected to commence on March 13, 2006, would be exclusively related to the liability aspects of the case.

Having no experience of the law and/or the process involved in reaching an amicable monetary amount of settlement, I inadvertently mentioned anywhere between \$3500.00 and \$5000.00, for each defendant, as an amount I am willing to settle the case for.

After speaking with my family, it has been brought to my attention that there are other factors which must be considered when making a lowest demand for settlement.

In short Mr. Maravich and perhaps unwisely I am going to make a proposed demand. However, beforehand, I am formally asking you to provide to me the information requested below:

1. Name of insurance carrier for each defendant:
2. Amount of coverage regarding liability and the limits for personal injury.
3. Identify the person and/or person(s) authorized to make an award determination in this case:

In summary the injuries I have sustained, including pain, suffering and loss of enjoyment of life and lost earning capacity will continue indefinitely. This also includes future earning power, as I anticipate release from confinement in the near term. An injured person is entitled to recover the difference between what he could have reasonably been expected to make without the injury and what he could reasonably be expected to make with the injury over the period he could reasonably be expected to remain in the work force.

I am approximately 44 years of age, and I have 10 years prior military experience and marketable skills which have been significantly diminished due to the injuries and resultant neurological damage I have sustained. The defendants are liable for future medical expenses, past and future physical pain, suffering and mental anguish, including, but not limited to lost earning capacity, impairment of vocational skill or employability, loss of enjoyment of life and delay damages.

Therefore, I am respectfully requesting a demand in the amount of ten thousand dollars (\$10,000.00) for each defendant, with delay damages and interest to be determined by the court.

I look forward to the information I have requested and your highest offer.

cc: Prothonotary
file

Sincerely,



Robert Richmond
Plaintiff, Pro se

VERIFICATION

I, Robert Richmond, plaintiff, do hereby certify that the within is true and correct subject to the penalty of perjury, pursuant to 28 U.S.C. ¶ 1746.

CERTIFICATE OF SERVICE

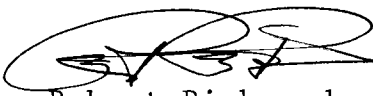
I hereby certify that I have served a correct copy of the foregoing to the persons and in the manner indicated:

First Class, U.S. mail, postage prepaid(institutional) to:

PROTHONOTARY
U.S. DISTRICT COURT
WESTERN DISTRICT
17 SOUTH PARK ROW
ERIE, PA. 16507

OFFICE OF THE ATTORNEY GENERAL
ATTN: CRAIG E. MARAVICH, Esq.
564 FORBES AVE
6th Floor, MANOR COMPLEX
Pittsburgh, Pa. 15219

Date November 30, 2005



By Robert Richmond
Plaintiff

FAX COVER SHEET

Attention: Craig Marruch Date: 11/24/05
 Department: Office of Attorney General
 Fax Number: (412) 865-3019
 From: Robert Richmond
 Number of Pages (Including this Cover Sheet): 5

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** Transmit Conf. Report **

Fax: 724-832-5535

SCI GREENSBURG

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ROBERT A. RICHMOND,)	
Plaintiff,)	
)	
Vs.)	CA 99-192 ERIE
)	
SUPERINTENDENT PRICE, et. al.,)	
Defendants.)	

ORDER

AND NOW this 3rd day of November, 2005, IT IS HEREBY ORDERED that a telephonic status conference is scheduled for **Wednesday, November 30, 2005 at 10:00 a.m.** before the Honorable Sean J. McLaughlin.

IT IS FURTHER ORDERED that Defendants' counsel shall initiate the call, and with the Plaintiff on the line, shall call the conference line at 814-464-9615.

S/Sean J. McLaughlin
Sean J. McLaughlin
United States District Judge

cc: all counsel/parties of record

LINDA BEBKO-JONES, MEMBER

- ☐ 801 EAST AVENUE
ERIE, PENNSYLVANIA 16503
PHONE: (814) 459-1949
FAX: (814) 871-4854
- ☐ 112 IRVIS OFFICE BUILDING
HOUSE BOX 202020
HARRISBURG, PENNSYLVANIA 17120-2020
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FAX: (717) 783-7548



House of Representatives
COMMONWEALTH OF PENNSYLVANIA
HARRISBURG

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October 11, 2005

Robert Richmond
DB 7852 B-1
RR 10 Box 10
Greensburg, PA 15601

Dear Mr. Richmond;

I contacted the Legislative Liaison in the Department of Corrections and spoke at length with her regarding your parole denial and subsequent request for parole consideration before the scheduled time of July 2006.

While the institution staff is pleased with your progress and recognizes your improved behavior you will not be reviewed for parole until July 2006.

You are very fortunate to have such a loving and supportive family. The fact that they are in your corner hopefully will give you the incentive you need to pass this time with sprit and grace, knowing that if your parole is granted, you will have this wonderful family to return to. I wish you nothing but the best.

Respectfully,

A large, stylized handwritten signature in black ink that reads "Linda Bebko-Jones".
Linda Bebko-Jones
State Representative
1st District



COMMONWEALTH OF PENNSYLVANIA
OFFICE OF ATTORNEY GENERAL

October 13, 2005

TOM CORBETT
ATTORNEY GENERAL

Litigation Section
Western Regional Office
6th Floor, Manor Complex
564 Forbes Avenue
Pittsburgh, PA 15219
(412) 565-2794
Fax: (412) 565-3028

Honorable Sean J. McLaughlin
United States District Court
17 South Park Row
Erie, PA 16501

Re: Richmond v. Price, et al.
Civil Action No. 99-192 ERIE

Dear Judge McLaughlin:

Please be advised that I have recently been informed that defendant Wilkes has returned form active duty. The above captioned case should be reopened.

Sincerely,

A handwritten signature in cursive script, reading "Craig E. Maravich".

Craig E. Maravich
Deputy Attorney General

cc: Robert Richmond, DB-7852